

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

William P. JOYCE, *et al.*,

Respondents.

Case No. 2:25-cv-1963 (MEF)

**UNOPPOSED MOTION FOR LEAVE TO FILE AN *AMICUS CURIAE*
BRIEF BY THE IMMIGRATION REFORM LAW INSTITUTE
IN SUPPORT OF RESPONDENTS AND IN OPPOSITION TO
PETITIONER’S MOTION FOR PRELIMINARY INJUNCTION**

The Immigration Reform Law Institute (“IRLI”) respectfully moves before the Honorable Michael E. Farbiarz, United States District Judge at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, for an order granting leave to file an *amicus curiae* brief in support Respondents and in opposition to Petitioner’s motion for preliminary injunction. Counsel for Petitioners and Respondents have been contacted and do not take a position on this motion.

IRLI is a nonprofit 501(c)(3) public interest law firm dedicated both to litigating immigration-related cases in the interests of United States citizens and to assisting courts in understanding federal immigration law. IRLI has litigated or filed *amicus curiae* briefs in a wide variety of immigration-related cases. For more than

twenty years the Board of Immigration Appeals has solicited supplementary briefing, drafted by IRLI staff, from the Federation for American Immigration Reform, of which IRLI is a supporting organization. For these reasons, IRLI has direct interests in the issues here.

The proffered *amicus* brief supplements Respondents discussion of the statutory judicial review scheme governing actions taken to remove aliens under the Immigration and Nationality Act in addition to provides reasons not to prematurely interfere with Petitioner's administrative removal proceedings. Because these issues are relevant to this Court's decision on the Petitioner's motion for preliminary injunction, IRLI's brief may aid the Court.

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For the foregoing reasons, IRLI respectfully requests that the Court grant its motion for leave to file the accompanying brief as *amicus curiae*.

Dated: April 2, 2025

Respectfully submitted,

s/ John Miano

JOHN M. MIANO

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April 2025, I electronically filed the foregoing motion—together with its accompanying *amicus* brief and proposed order—with the Clerk of the Court using the CM/ECF system, which I understand to have caused service of the parties' counsel.

s/ John Miano
JOHN M. MIANO